

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BYJU's ALPHA, INC.,<sup>1</sup>

Debtor.

Chapter 11

Bankruptcy Case No. 24-10140 (JTD)

Adv. Pro. Case No. 24-50013 (JTD)

Bankruptcy BAP No. 24-15

CAMSHAFT CAPITAL FUND, LP, *et al.*

Defendant-Appellants,

v.

BYJU's Alpha, Inc.

Plaintiff-Appellee,

GLAS Trust Company LLC,

Intervenor-Appellee.

Case No. 24-00358 (MN)  
(Consolidated)

**APPELLANT'S DESIGNATION OF ITEMS TO BE INCLUDED IN THE  
RECORD ON APPEAL AND THE STATEMENT OF THE ISSUES**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, Defendant-Appellant Riju Ravindran ("**Ravindran**" or "**Appellant**"), by and through his undersigned counsel, hereby submits this statement of issues and designations of items to be included in Appellant's appeal of the *Order on Finding of Contempt* [Adv. Docket No. 204] entered on May 28, 2024 (the "**Contempt Order**"), including, without limitation, any and all orders, judgments, decrees, decisions, rulings, and opinions that may subsequently be entered regarding the Contempt Order.

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<sup>1</sup> The Debtor in this Chapter 11 case, along with the last four digits of the Debtor's federal tax identification number, is: BYJU's Alpha, Inc. (4260). The location of the Debtor's service address for purposes of this Chapter 11 case is: 1007 N. Market Street Ste. G20 452, Wilmington, Delaware 19801.

**DESIGNATION OF THE RECORD ON APPEAL<sup>2</sup>**

The Appellant designates the following items to be included in the record on appeal:

<i>BYJU's Alpha, Inc. v. Camshaft Fund, LP, et al.</i> , Adv. No. 24-50013 (Bankr. D. Del) (JTD)			
ITEM No.	FILING DATE	ADV. DOCKET No.	PLEADING
1	February 2, 2024	5	Complaint for Avoidance and Recovery of Fraudulent Transfers (with Exhibits)
2	February 9, 2024	7	Emergency Motion of Debtor for Limited Expedited Discovery, or, Alternatively, for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examination (with Exhibits)
3	February 9, 2024	8	Motion of Debtor for Shortening Notice and Scheduling Expedited Hearing on Debtor's Motion for Expedited Discovery, or Alternatively, for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examination (with Exhibits)
4	February 12, 2024	10	Amended Objection of Defendants to Motion of Debtor for Shortening Notice and Scheduling Expedited Hearing on Debtor's Motion for Expedited Discovery or, Alternatively, for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examination (with Exhibits A and B)
5	February 13, 2024	11	Order Granting Motion of Debtor for Shortening Notice and Scheduling Expedited Hearing on Debtor's Motion for Expedited Discovery, or, Alternatively for an Order Pursuant to Bankruptcy Rule 2004
6	February 16, 2024	21	Minute Entry granting Debtor's Emergency Motion for Expedited Discovery
7	February 16, 2024	22	Order Granting Debtor's Emergency Motion for Limited Expedited Discovery or, Alternatively, for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examination
8	February 29, 2024	40	<i>Amended</i> Complaint for Avoidance and Recovery of Fraudulent Transfers (with Exhibits) [SEALED Adv. Docket No. 30]

<sup>2</sup> Items designated include all exhibits and submissions attached thereto and, as to hearing transcripts, all documents admitted into evidence.

<i>BYJU's Alpha, Inc. v. Camshaft Fund, LP, et al.</i> , Adv. No. 24-50013 (Bankr. D. Del) (JTD)			
ITEM No.	FILING DATE	ADV. DOCKET No.	PLEADING
9	February 29, 2024	41	Debtor's Motion for Temporary Restraining Order
10	February 29, 2024	42	Debtor's Brief in Support of Motion for Temporary Restraining Order
11	March 4, 2024	54	Minute Entry: Status Conference Held
12	March 4, 2024	56	Order to Show Cause
13	March 5, 2024	58	Memorandum of Law of Defendant Riju Ravindran in Opposition to Debtor's Motion for Temporary Restraining Order
14	March 5, 2024	59	Declaration of Riju Ravindran
15	March 6, 2024	60	Intervenor GLAS Trust Company LLC's Joinder in Support of the Debtor's Motion for Temporary Restraining Order
16	March 6, 2024	61	Debtor's Brief in Further Support of Motion for Temporary Restraining Order
17	March 12, 2024	73	The Debtor's and GLAS Trust Company's Supplemental Brief Regarding Grupo Mexicano and Preliminary Injunctive Relief
18	March 12, 2024	74	<i>Supplemental</i> Memorandum of Law of Defendant Riju Ravindran in Opposition to Debtor's Motion for Temporary Restraining Order
19	March 18, 2024	84	Order Granting Debtor's Motion for a Preliminary Injunction
20	March 21, 2024	91	Certification of Counsel and Declaration of Riju Ravindran
21	March 26, 2024	93	Notice of Appeal of Defendant Riju Ravindran to the United States District Court for the District of Delaware
22	March 29, 2024	109	Debtor's Motion for a Ruling to Show Cause Why Riju Ravindran Should Not Be Held in Contempt for Violating the Preliminary Injunction Order

<i>BYJU's Alpha, Inc. v. Camshaft Fund, LP, et al.</i> , Adv. No. 24-50013 (Bankr. D. Del) (JTD)			
ITEM No.	FILING DATE	ADV. DOCKET No.	PLEADING
22	April 3, 2024	115	Memorandum Opinion
23	April 8, 2024	121	<i>Supplemental</i> Certification of Counsel and Declaration of Riju Ravindran
24	April 8, 2024	123	Debtor's Motion for Leave to File a Second Amended Complaint [SEALED Adv. Docket No. 120]
25	April 8, 2024	129	Defendant Riju Ravindran's Answer to <i>Amended</i> Complaint for Avoidance and Recovery of Fraudulent Transfers, Breach of Fiduciary Duties, and Violation of Automatic Stay [SEALED Adv. Docket No. 124]
26	April 23, 2024	149	Order Granting Plaintiff Leave to File <i>Second Amended</i> Complaint
27	April 24, 2024	153	<i>Second Amended</i> Complaint for Avoidance and Recovery of Fraudulent Transfers, Breach of Fiduciary Duties, Aiding and Abetting Breach of Fiduciary Duties, Accounting, Declaratory Judgment, Turnover of Property, Conversion, and Violation of Automatic Stay (with Exhibits) [SEALED Adv. Docket No. 151]
28	May 2, 2024	165	Order to Show Cause
29	May 8, 2024	184	Defendant Riju Ravindran's Answer to <i>Second Amended</i> Complaint [SEALED Adv. Docket No. 179]
30	May 10, 2024	185	Declaration of Riju Ravindran (with exhibits) [SEALED Adv. Docket No. 183]
31	May 14, 2024	187	Objection of Riju Ravindran to Debtor's Motion for a Ruling to Show Cause Why Riju Ravindran Should Not Be Held in Contempt for Violating the Preliminary Injunction Order
32	May 24, 2024	202	Debtor's Reply in Further Support of Motion for a Ruling to Show Cause Why Riju Ravindran Should Not Be Held in Contempt for Violating the Preliminary Injunction Order [SEALED Adv. Docket No. 189]
33	May 28, 2024	204	Order on Finding of Contempt

<i>BYJU's Alpha, Inc. v. Camshaft Fund, LP, et al.</i> , Adv. No. 24-50013 (Bankr. D. Del) (JTD)			
ITEM No.	FILING DATE	ADV. DOCKET No.	PLEADING
34	May 30, 2024	219	Notice of Appeal of Defendant Riju Ravindran to the United States District Court for the District of Delaware

<i>In re BYJU's Alpha, Inc.</i> , Case No. 24-10140 (Bankr. D. Del) (JTD)			
ITEM No.	FILING DATE	ADV. DOCKET No.	PLEADING
1	March 5, 2024	128	Transcript of Hearing Held March 1, 2024
2	March 5, 2024	129	Transcript of Hearing Held March 4, 2024
3	March 8, 2024	139	Transcript of Hearing Held March 6, 2024
4	March 18, 2024	145	Transcript of Hearing Held March 14, 2024
5	May 28, 2024	206	Transcript of Hearing Held on May 21, 2024

### **STATEMENT OF THE ISSUES ON APPEAL<sup>3</sup>**

1. Did the Bankruptcy Court err in issuing the Contempt Order by holding Ravindran in civil contempt for failing to comply with the Court's Order Granting Debtor's Motion for a Preliminary Injunction, dated March 18, 2024 [Adv. Docket No. 84] ("**P.I. Order**") because the P.I. Order included mandatory relief against Ravindran despite also finding that the standard for a mandatory injunction had not been satisfied?

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<sup>3</sup> Defined terms carry the meaning ascribed to them in the corresponding decision or order from which appealed.

2. Did the Bankruptcy Court err in issuing the Contempt Order by concluding that Ravindran did not take all necessary steps to determine the location, amount, and composition of the Alpha Funds?

3. Did the Bankruptcy Court err in issuing the Contempt Order because it included broad and full discovery into Ravindran's financial situation?

4. Did the Bankruptcy Court err in issuing the Contempt Order by ordering that Ravindran is precluded from asserting that the Alpha Funds were transferred from the Debtor to Camshaft Capital Fund LP, and subsequently from Camshaft Capital Fund LP to Inspilearn LLC, for a proper purpose?

Dated: June 13, 2024  
Wilmington, Delaware

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